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EXHIBIT B
PROPOSED ORDER

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER (I) ESTABLISHING A BAR
DATE FOR FILING FIRE CLAIMS,
(II) APPROVING THE FORM AND
PROCEDURES FOR NOTICE OF THE
BAR DATE FOR FIRE CLAIMS, AND
(III) APPROVING SUPPLEMENTAL
PROCEDURES FOR NOTICE OF THE
BAR DATE TO FIRE CLAIMANTS**

Upon the Motion, dated May 31, 2019 (the “**Motion**”),¹ of the Official Committee of Tort Claimants (the “**TCC**”), pursuant to sections 105(a), 501 of title 11 of the United States Code, Rules 3001(a), 3003(c), 5005 and 9007 of the Federal Rules of Bankruptcy Procedure and

¹ Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Motion.

1 Rule 3003-1 of the Bankruptcy Local Rules for the United States District Court for the Northern
2 District of California (the “**Bankruptcy Local Rules**”), for entry of an order (i) approving a
3 separate bar date for Fire Claims, (ii) approving the form for notice of the bar date for Fire Claims
4 and related procedures, and (iii) approving supplemental procedures for providing notice of
5 important deadlines to Fire Claimants in the above-captioned chapter 11 cases; and this Court
6 having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§
7 157 and 1334, the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*,
8 General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a); and venue being proper
9 before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found and
10 determined that notice of the Motion as provided to the parties listed therein is reasonable and
11 sufficient, and it appearing that no other or further notice needs to be provided; and this Court
12 having reviewed the Motion, the Weisbrot Declaration and the Dion Declaration; and this Court
13 having held a hearing on the Motion; the Court having reviewed the proposed Fire Claim Bar Date
14 Notice attached to the Motion as **Exhibit A** and determined that the legal and factual bases set forth
15 in the Motion establish just cause for the relief granted therein; and it appearing that the relief
16 requested in the Motion is in the best interest of the Debtors’ estates, creditors, shareholders, and
17 all parties in interest; and upon all of the proceedings had before this Court and after due
18 deliberation and sufficient cause appearing therefor,

19 **IT IS HEREBY ORDERED THAT:**

- 20 1. The Motion is granted as provided herein.
- 21 2. The TCC’s Notice Program (including the Supplemental Notice Program) is hereby
22 approved and Angeion Group, LLC (“**Angeion**”) is authorized as noticing agent to provide notice
23 of the Fire Claim Bar Date as set forth in the Motion and this Order.
- 24 3. The following procedures for filing Fire Proofs of Claim are approved:
 - 25 (a) Except as otherwise noted herein, the Fire Claim Bar Date for filing all Fire
26 Proofs of Claim in the Chapter 11 Cases shall be **January 31, 2020 at 9:00**
27 **p.m. (Pacific Time).**

(b) Fire Proof of Claim Forms must:

- (1) be written in the English language;
- (2) conform substantially to the Fire Proof of Claim Form or Official Form No. 410; and
- (3) be signed by the Fire Claimant or, if the Fire Claimant is not an individual, by an authorized agent of the Fire Claimant.

(c) All timely-filed Fire Proof of Claim Forms will be deemed filed against both Debtors (without prejudice to the Debtors' right to assert that any such claim should be allowed only as to one of the Debtors).

(d) All Fire Proofs of Claim must be filed either (i) electronically through Prime Clerk's website using the interface available on the Case Website under the link entitled "Submit a Claim" (the "**Electronic Filing System**") or (ii) by delivering the original Fire Proof of Claim Form by hand, or mailing the original Fire Proof of Claim Form so that is received on or before the Bar Date as follows:

If by first class mail:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4850
New York, NY 10163-4850

If by overnight courier:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

If by hand delivery:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

-or-

At one of the Debtors' Claim Service Centers located at the following PG&E locations:

- (i) 350 Salem Street, Chico, CA 95928;
- (ii) 231 "D" Street, Marysville, CA 95901;
- (iii) 1567 Huntoon Street, Oroville, CA 95965;
- (iv) 3600 Meadow View Road, Redding, CA 96002;
- (v) 111 Stony Circle, Santa Rosa, CA 95401; or
- (vi) 1850 Soscol Ave. Ste 105, Napa, CA 94559.

- (e) A Fire Proof of Claim Form shall be deemed timely filed only if it is **actually received** by Prime Clerk (i) at the addresses listed above in subparagraph (d) or (ii) electronically through the Electronic Filing System on or before the Fire Claim Bar Date.
- (f) Fire Proofs of Claim sent by facsimile, telecopy, or electronic mail transmission (other than Fire Proofs of Claim filed electronically through the Electronic Filing System) **will not** be accepted.
- (g) In the event that the Debtors amend or supplement their Schedules subsequent to the date of entry of this Order, the Debtors shall give notice of any amendment or supplement to the holders of claims or interests affected thereby, and such holders shall have until the later of (i) the Fire Claim Bar Date or (ii) thirty (30) days from the date of such notice to file a Fire Proof of Claim or be barred from doing so and shall be given notice of such deadline.
- (h) The following persons or entities are **not** required to file a Fire Proof of Claim solely with respect to the claims described below:
 - (i) any person or entity that is not a Fire Claimant;
 - (ii) any Fire Claimant who has already filed a Fire Proof of Claim against any of the Debtors with respect to the claim being asserted, utilizing a claim form that substantially conforms to the Fire Proof of Claim Form or Official Form No. 410; provided, however, that any Fire

1 Claimant who holds or asserts a claim other than a Fire Claim must
2 file a general proof of claim prior to the general claims bar date set
3 in the Chapter 11 Cases;

4 (iii) any Fire Claimant whose claim has been paid in full;

5 (iv) any Fire Claimant who holds a claim that heretofore has been
6 allowed by Order of the Court entered on or before any applicable
7 bar date set for Fire Claims in the Chapter 11 Cases; and

8 (v) any Fire Claimant whose claim is listed on the Schedules; provided
9 that (A) the claim is **not** listed on the Schedules as “disputed,”
10 “contingent,” or “unliquidated,” (B) the Fire Claimant does not
11 dispute the amount, nature, and priority of the claim as set forth in
12 the Schedules, and (C) the Fire Claimant does not dispute that the
13 claim is an obligation of the specific Debtor against which the claim
14 is listed in the Schedules.

15 4. Any documentation submitted in connection with Fire Proof of Claim Forms shall
16 remain confidential in these Chapter 11 Cases and shall not be made available to the general public.
17 Copies of such information shall be provided to counsel for the Committees, the U.S. Trustee and
18 any additional parties the Court directs but only after each such party agrees to keep the information
19 provided in the Fire Proof of Claim Forms confidential.

20 5. Pursuant to Bankruptcy Rule 3003(c)(2), all holders of Fire Claims, including Fire
21 Claimants, that fail to comply with this Order by timely filing a Proof of Claim in the appropriate
22 form shall (i) be forever barred, estopped and enjoined from asserting such claims against the
23 Debtors, their property, or their estates (or submitting a Proof of Claim with respect thereto) and
24 (ii) not be treated as a creditor with respect to such claim for the purposes of voting and distribution
25 with respect to any chapter 11 plan or plans of reorganization that may be filed in these Chapter 11
26 Cases. Notwithstanding the foregoing, late filings shall be permitted where the failure to act was
27 the result of “excusable neglect” under the standard set forth in *Pioneer Investment Services Co. v.*
28 *Brunswick Associates Ltd. Partnership*, 507 U.S. 380 (1993) or as otherwise permitted by the Court.

1 6. No party, including the Debtors, may object in whole or in part to any Fire Claim
2 prior to the Fire Claim Bar Date.

3 7. Within five (5) days of entry of this Order, the Debtors, Prime Clerk, and the TCC
4 shall post the Fire Claim Bar Date Notice on their respective websites.

5 8. At least one hundred twenty (120) days prior to the Fire Claim Bar Date, Angeion
6 shall cause to be mailed to their last known address as identified using the methods more fully laid
7 out in the Motion and the Weisbrot Declaration (i) a Fire Proof of Claim Form, and (ii) the Fire
8 Claim Bar Date Notice on all known and reasonably identifiable Fire Claimants.

9 9. Within fourteen (14) days after entry of this Order, the Debtors and Prime Clerk
10 shall turn over to Angeion a file containing the name and address of all known or identifiable Fire
11 Claimants derived from the information sources listed in the Weisbrot Declaration, which include
12 but are not limited to: pre-petition litigation records; PG&E customer data; Geographic
13 Information Systems (“GIS”) data; Emergency Fund data; and first-party intelligence such as
14 public records. The Debtors and Prime Clerk shall furnish updated contact information on an
15 ongoing basis and in no event later than three (3) days after receipt of such information.

16 10. The Supplemental Notice Plan is hereby approved and Angeion is authorized to
17 implement the components of the Supplemental Notice Program as set forth in the Motion.

18 11. Nothing contained in this Order or in the Motion is intended to be or shall be
19 construed as (a) an admission as to the validity of any claim against the Debtors, (b) a waiver of
20 the Debtors’ or any appropriate party in interest’s rights to dispute any claim, or (c) an approval or
21 assumption of any agreement, contract, program, policy, or lease under section 365 of the
22 Bankruptcy Code.

23 12. Notwithstanding entry of this Order, nothing herein shall create, nor is intended to
24 create, any rights in favor of or enhance the status of any claim held by any party.

25 13. The Debtors, Prime Clerk, the TCC, and Angeion are authorized and directed to take
26 all steps necessary or appropriate to carry out this Order.

1 14. Entry of this Order is without prejudice to the right of the Debtors to seek a further
2 order of this Court fixing the date by which holders of claims not subject to the Fire Claim Bar Date
3 established herein must file such claims against the Debtors or be forever barred from so doing.

4 15. This Court shall retain jurisdiction to hear and determine all matters arising from or
5 related to the implementation, interpretation, or enforcement of this Order.

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7 ** END OF ORDER **
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